



**DEPARTMENTS OF THE ARMY  
MASSACHUSETTS ARMY NATIONAL GUARD TRAINING SITE  
CAMP EDWARDS  
CAMP EDWARDS, MA 02542-5003**

Commander Camp Edwards

29 July 2013

Lynne A. Jennings  
U. S. Environmental Protection Agency  
5 Post Office Square, Suite 100  
Mail Code OSRR07-3  
Boston, MA 02109-3912

Subject: Supplemental Environmental Project 4th Quarterly Report, Consent Order Final Agreement, Docket No. SDWA 01-2012-0021

Dear Lynne Jennings,

As outlined in the Consent Order Final Agreement (CAFO) with the MAARNG please consider this our 4th quarterly report. The CAFO Paragraph 52, states that the "Respondent shall submit quarterly written reports outlining work completed to date and funds spent to date. The quarterly reports will include copies of invoices documenting funds spent towards completion of the SEP. The reports shall be submitted to the United States Environmental Protection Agency (USEPA) by the 30th day of the month following each quarter (January, April, July, October)."

Work commenced on this project on November 3, 2012 in compliance with the CAFO requiring work begin within 90 days of the approval (August 29, 2012) of the CAFO, making the deadline to start work 29 November 2012. The attached map, enclosure 1, indicates the areas designated as SEP impervious surface (asphalt) areas removed.

For the fourth quarter work began again on 6 May 2013. As of 28 June 2013 approximately 610,381 square feet or 14 acres of impervious surface has been removed. This was accomplished with 3024-Man hours, 1610.05 equipment hours, and 2632.2 gallons of fuel. The total cost of the project to date is \$88,774.81. Enclosure 2 breaks down the cost of the work effort to date.

Per USEPA's letter dated 29 May 2013 the CAFO was modified with regards to material disposal: "Respondent shall remove and stockpile reclaimed materials at the site of the proposed UTES facility within MMR. Respondent shall have the option of transporting any portion of such reclaimed materials off-base to a facility to be processed for reuse or recycling. Storage, transportation, or disposal by Respondent of the reclaimed materials shall be in accordance with any applicable laws or regulations related to storage, transportation, or disposal of the excavated asphalt material.

A second CAFO change request was submitted to USEPA on 19 July 2013. The MANG requested the following specific changes: changing the relevant to the CAFO deadline from 9 months to 10 months, Section IV, Paragraph 51, "Implementation", in the CAFO, and the deadline of 275 days to 305 days in Attachment 1, Paragraph G, "Schedule" of the CAFO. This request was made to allow for letting a contract to remove the excavated material from the UTES site to an offsite, reclamation, and recycling facility. As part of this request the required Completion Report will be submitted to USEPA 30 days following the completion of the SEP.

The excavated SEP material will be screened to remove soil and other native material. We estimate that the volume of excavated material for reclamation and recycling will be reduced from approximately 20K ton to around 7600 tons. The estimated total cost for offsite "disposal" is \$78,600.

Please let us know if you have any questions.

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fines and imprisonment.*

Respectfully,



EDWARD P. GALLAGHER

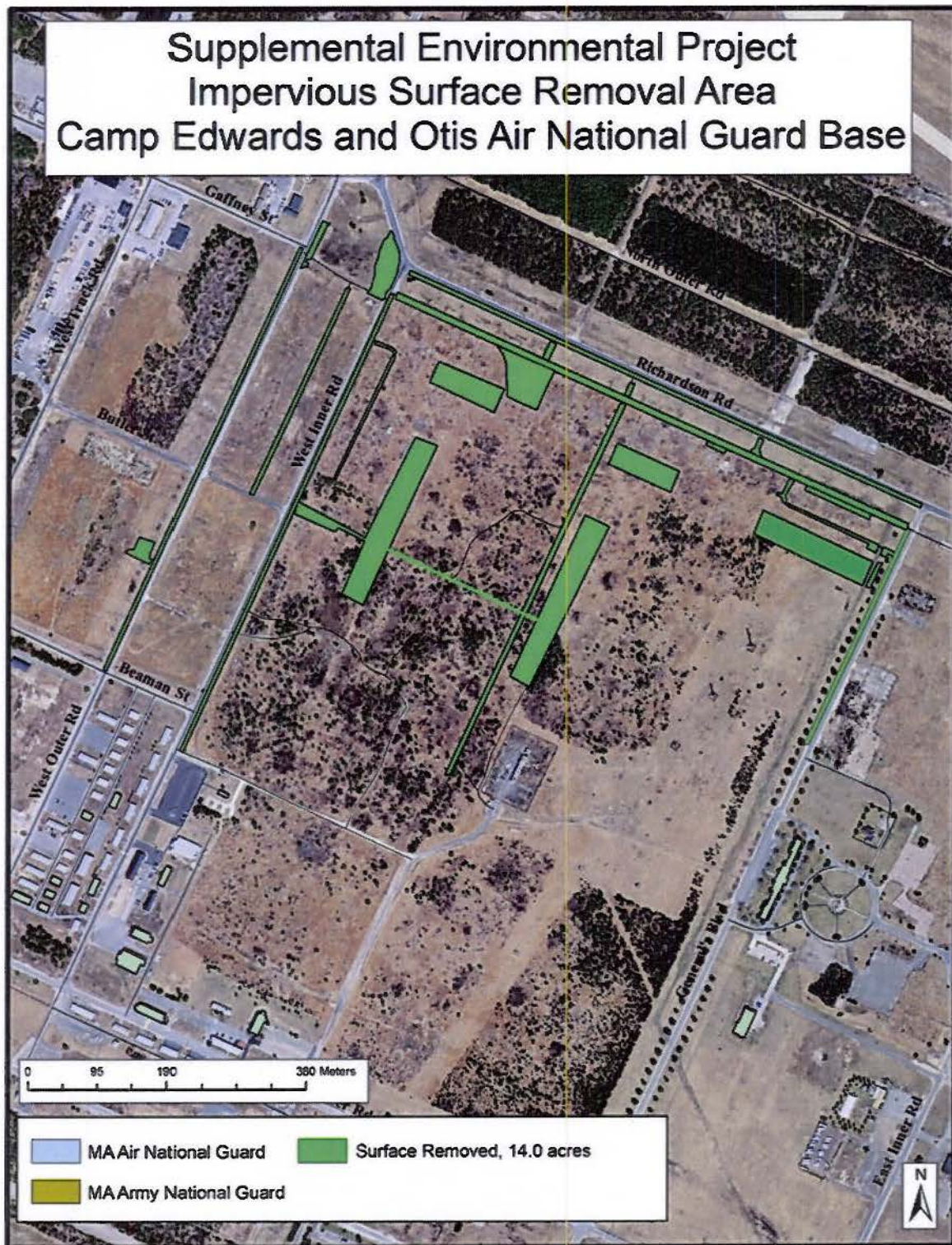
MAJOR

Administrative Officer

Enclosure: (2)



Enclosure 1.



## Enclosure 2.

### SEP Production Report Impervious Surface Removal Project

Report Period  
03 November 2012 - 29 June 2013

|                 | 3-4 Nov 12  | 26 Nov-7 Dec 12 | 8-19 Apr 13  | 6-19 MAY 13 | 16-29 JUN 13 | Totals to Date |
|-----------------|-------------|-----------------|--------------|-------------|--------------|----------------|
| <b>MANPOWER</b> |             |                 |              |             |              |                |
| Personnel       | 5           | 3               | 13           | 13          | 14           | 48             |
| Manhours        | 51          | 240             | 1324.5       | 1456        | 1568         | 4639.5         |
| Cost            | \$ 1,048.43 | \$ 3,613.90     | \$ 14,408.77 | \$26,270.16 | \$26,658.10  | \$ 71,999.36   |

|                  |           |             |             |             |             |              |
|------------------|-----------|-------------|-------------|-------------|-------------|--------------|
| <b>EQUIPMENT</b> |           |             |             |             |             |              |
| Hours            | 32        | 210         | 565.1       | 1297.3      | 312.75      | 2417.15      |
| Gallons (JP-8)   | 69        | 405.75      | 1140        | 1805.2      | 827         | 4246.95      |
| Cost             | \$ 272.55 | \$ 1,602.71 | \$ 4,503.00 | \$ 7,130.54 | \$ 3,266.65 | \$ 16,775.45 |

|                   |             |             |             |             |              |             |
|-------------------|-------------|-------------|-------------|-------------|--------------|-------------|
| <b>PRODUCTION</b> |             |             |             |             |              |             |
| SQ FT             | 10,252      | 68,000      | 173,630     | 271,379     | 87,120       | 610,381     |
| ACRES             | 0.2354      | 1.561       | 3.986       | 6.23        | 2            | 14.0124     |
| COST/Acre         | \$ 5,611.64 | \$ 3,341.84 | \$ 4,744.55 | \$ 5,361.27 | \$ 14,962.38 | \$ 6,804.33 |

|               |             |             |              |              |              |              |
|---------------|-------------|-------------|--------------|--------------|--------------|--------------|
| <b>TOTALS</b> |             |             |              |              |              |              |
| Production    | 1.68%       | 11.15%      | 28.47%       | 44.50%       | 14.29%       | 100.09%      |
| Cost          | \$ 1,320.98 | \$ 5,216.61 | \$ 18,911.77 | \$ 33,400.70 | \$ 29,924.75 | \$ 88,774.81 |

Man Power cost is derived from Grade and Time-In-Service (TIS), hours worked on the project and Pay Status (IDT or ADOS)

Equipment Cost is based solely on Gallons of JP-8 fuel consumed.

Production is as a percentage against the 14 acre requirement